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VIA-ELECTRONIC MAIL
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Carmen Ortiz
Jack Pirozzolo
Assistant United States Attorneys
John Joseph Moakley Federal Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02110

RE: *United States v. George Schussel*
Cr. No. 04-10060-RCL

Dear Carmen and Jack:

Pursuant to Fed. R. Crim. P. 12(b)(1)(C), the defendant provides you with the following disclosures of our intention to rely on expert witnesses:

I. Charles Reilly

Mr. Reilly is expected, if called, to give expert opinions that (1) Edward DeFranchesci had sufficient knowledge regarding DCIL, its relation to George Schussel, and its function in receiving payments so that he would be required, consistent with the attorney-client privilege, to either answer questions propounded by an IRS Revenue Agent accurately or to decline to answer such questions; (2) Edward DeFranchesci, as the representative of DCI and Mr. Schussel in relation to the 1997-8 tax audit, had the obligation to determine what facts to disclose and what facts not to disclose in response to questions, whether oral or in writing, propounded by the IRS Revenue Agent; (3) Attempts to delete management records such as portions of the vendor or attendee database did not deprive the IRS of records requested by their initial IDR nor records that would normally be requested by the IRS in conducting tax audits; (4) Records that were the subject of the so-called "Project Phoenix" would either not be requested in a tax audit or would be available to the auditor from third party sources; (5) Bermuda is a common venue for U.S. corporations engaged in a business or trade which generate foreign income and is frequently and legitimately relied upon by such corporations, often through subsidiaries, to avoid unnecessarily avoid double taxation; (6) Schussel's accountant had

sufficient information from Schussel in both 1995 and 1996 to accurately compute Schussel's taxable income including income derived from DCIL.

Mr. Reilly has relied on his review of the testimony and the exhibits introduced in the three day evidentiary hearing in the above-captioned matter as well as the Indictment and various memoranda and notes that have been disclosed to the defense by the Government that relate to "Project Phoenix".

Mr. Reilly's CV is attached to this letter.

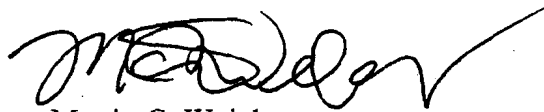
II. Arnold Rosenfeld

A full report of his opinions, the basis of his opinions, and his CV were provided prior to the evidentiary hearings in this case. Further copies are available upon request.

~~If you require any further information about these experts please advise.~~

Thank you.

Yours truly,



Martin G. Weinberg

Cc: Francis J. DiMento, Esq.
DiMento & Sullivan
7 Faneuil Marketplace, 3rd Floor
Boston, MA 02109

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p.2

Charles J. Reilly**Curriculum Vitae**

Place and Date of Birth: Pawtucket, Rhode Island; October 10, 1950

Admissions: Admitted to practice law -- Rhode Island 1979
Certified Public Accountant -- Rhode Island 1976

Admitted to Practice Before:

U. S. District Court, District of Rhode Island
U. S. Court of Appeals, First Circuit
U. S. Claims Court
U. S. Supreme Court
U. S. Tax Court

Education:

Providence College (BSBA 1972)
Suffolk University (JD 1979)

Work Experience:

Revenue Agent, Internal Revenue Service -- 1972-1975
Office of the Regional Commissioner -- Appeals Officer -- 1975-1981
Partner -- Arcare & Reilly, Inc. -- 1981 to 1991
Owner -- Reilly Law Associates, Inc. -- 1991 to present
Adjunct Professor -- Bryant College -- Graduate Tax Program
Tax Practice and Procedure -- 1985-1995 -- lecturer -- Tax Practice and Procedures

Professional Organizations:

American Institute of CPA
American Institute of CPA - Tax Section
Rhode Island Society of CPA
American Bar Association
American Bar Association - Tax Section
Rhode Island Bar Association
Rhode Island Bar Association - Tax Section -- Chairman - 1996-2000

Expert Testimony:

U. S. Tax Court
U. S. District Court, District of Rhode Island
U. S. District Court, District of New Hampshire
Rhode Island District Court
Rhode Island Superior Court

Other Professional Listings:

Who's Who in America
Who's Who in American Law
Best Lawyers in America
Best Lawyers in Rhode Island (Rhode Island Monthly)
Martindale Hubbell - AV Rating